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Attorneys for Plaintiffs DAWN WILLIAMS and
 DANIEL WILLIAMS

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

DAWN WILLIAMS and DANIEL WILLIAMS,) Case No. 4:21-cv-04285-HSG

Plaintiffs,)

v.)

ETHICON WOMEN'S HEALTH AND)
 UROLOGY, a Division of ETHICON, INC.;)
 GYNECARE, a Division of ETHICON, INC.;)
 ETHICON, INC.; and JOHNSON & JOHNSON,)

Defendants.)

**STIPULATION TO PERMIT FILING OF A
 FIRST AMENDED COMPLAINT AND
 EXTEND TIME FOR DEFENDANTS TO
 RESPOND; ORDER**

**TO THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
 CALIFORNIA:**

Defendants Ethicon, Inc. and Johnson & Johnson ("Defendants") and Plaintiffs Dawn Williams
 and Daniel Williams ("Plaintiffs"), by and through their respective undersigned counsel, hereby submit
 this Stipulation to Permit Filing of First Amended Complaint and to Extend Time for Defendants to
 Respond to First Amended Complaint based on the following:

RECITALS

1. Plaintiffs initiated this matter by filing a Complaint in the United States District Court,
 Northern District of California on June 4, 2021 (ECF No. 1).

STIPULATION TO PERMIT FILING OF A FIRST AMENDED COMPLAINT AND EXTEND TIME FOR
 DEFENDANTS TO RESPOND; ORDER

2. On August 20, 2021, Plaintiffs served the Summons and Complaint.

3. On September 7, 2021, the Court granted the parties' stipulation to extend Defendants' time to respond to the Complaint from September 10, 2021 to October 8, 2021 (ECF No. 16).

4. Subsequently, counsel for Defendants and counsel for Plaintiffs met and conferred on Defendants' intention to file a Motion to Dismiss pursuant to Federal Rule of Procedure 12(b)(6). In lieu of Defendants filing the Motion to Dismiss, the parties agreed that Plaintiffs would file a First Amended Complaint on or before October 22, 2021.

5. The parties further agreed to Defendants' response to the First Amended Complaint being due on or before November 19, 2021.

STIPULATION

THEREFORE, the parties, by and through their respective undersigned counsel, stipulate and agree to the following, and respectfully request that the Court enter this stipulation as an order:

Plaintiffs' deadline to file a First Amended Complaint is October 22, 2021.

Defendants' deadline to respond to the First Amended Complaint will be November 19, 2021.

IT IS SO STIPULATED.

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DATED: October 4, 2021

DOLAN LAW FIRM, PC

By: /s/ Lourdes DeArmas
Lourdes DeArmas
Attorneys for Plaintiffs
DAWN WILLIAMS and
DANIEL WILLIAMS

DATED: October 4, 2021

Tucker Ellis LLP

By: /s/ Joshua J. Wes
Joshua J. Wes
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Attorneys for Defendants
ETHICON, INC. and
JOHNSON & JOHNSON

SIGNATURE ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I attest that all other signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.

DATED: October 4, 2021

TUCKER ELLIS LLP

By: /s/ Joshua J. Wes
Joshua J. Wes
Attorneys for Defendants
ETHICON, INC. and
JOHNSON & JOHNSON

ORDER

IT IS ORDERED that the Plaintiffs shall file a First Amended Complaint on or before October 22, 2021. It is further ordered that Defendants shall file a response to the First Amended Complaint on or before November 19, 2021.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 10/5/2021



The Honorable Haywood S. Gilliam, Jr.